

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

KRISTEN FREDRICKS, JOSEPH V. CUFFARI,
JOSEPH E. GANGLOFF, and JAMES M. READ

Plaintiffs,

v.

COUNCIL OF THE INSPECTORS GENERAL
ON INTEGRITY AND EFFICIENCY (“CIGIE”)
INTEGRITY COMMITTEE (“IC”); KEVIN H.
WINTERS, Chairman, IC, in his official capacity;
ROBERT P. STORCH, Vice-Chairman, IC, in his
official capacity; GAIL S. ENNIS, Member, IC, in
her official capacity; KIMBERLY A. HOWELL,
Member, IC, in her official capacity; DALE A.
CHRISTOPHER, Deputy Director for Compliance,
U.S. Office of Government Ethics, in his official
capacity; TOM MONHIM, Member, IC, in his
official capacity; CATHERINE S. BRUNO, Member,
IC, in her official capacity; ALLISON LERNER,
Inspector General, National Science Foundation,
Former Chair and Vice Chair, CIGIE, in her official
capacity,

Defendants.

No. 1:23-cv-442 (RDA/LRV)

CONSENT MOTION TO REPLACE EXHIBIT

Pursuant to Local Rule 7, Defendants, through undersigned counsel, hereby respectfully move to replace the exhibit filed as Dkt. No. 13-1—which contains personal contact information for an Investigative Counsel from the Department of Justice’s Office of Inspector General (“DOJ OIG”), along with personal contact information for Plaintiff Joseph Gangloff—with the exhibit attached to this motion. The grounds for this motion are as follows:

1. On July 17, 2023, Plaintiffs filed an opposition to Defendants’ motion to dismiss, *see* Dkt. No. 13. Plaintiffs attached to their complaint a copy of an email communication between an Investigative Counsel for DOJ OIG and Plaintiff Joseph Gangloff.

2. The email communication contains personal telephone and email address information for both the DOJ OIG Investigative Counsel and Mr. Gangloff.

3. For the sake of both individuals' privacy, Defendants, with Plaintiffs' consent, respectfully request that the Court strike Dkt. No. 13-1 and in its place substitute the attached Exhibit 1, Dkt. No. 19-1. The replacement exhibit is identical to Dkt. No. 13-1 except that it redacts the phone numbers and email addresses of each of the individuals on the email.

4. Defendants have attached as Exhibit 2 a proposed order for the Court's convenience.

5. The undersigned have conferred with counsel for Plaintiffs, who has indicated that Plaintiffs consent to this motion.

6. Defendants waive hearing on this motion.

Dated: August 8, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JESSICA D. ABER
UNITED STATES ATTORNEY

LAUREN A. WETZLER
Chief, Civil Division

/s/
REBECCA S. LEVENSON
Assistant United States Attorney
Office of the United States Attorney
2100 Jamieson Avenue
Alexandria, Virginia 22314

Tel: (703) 299-3760
Fax: (703) 299-3983
Email: rebecca.s.levenson@usdoj.gov

CHRISTOPHER R. HALL
Assistant Branch Director
Federal Programs Branch

CHRISTOPHER A. EISWERTH
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L. Street, NW
Washington, DC 20044
Tel.: (202) 305-0568
Fax: (202) 616-8460
Email: christopher.a.eiswerth@usdoj.gov

Counsel for Defendants